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By ECF

October 25, 2021

Honorable Gregory H. Woods  
United States District Court  
500 Pearl St.  
New York, NY 10007-1312

Re: Case No. 16-cr-00680-GHW, U.S. v. Madrid

Dear Judge Woods:

Both Mr. Meza and Mr. Cazarez along with their counsels are requesting a continuance of the current sentencing date from November 22, 2021, to a date convenient to the Court in January 2022. As the Court will recall, co-counsel for Mr. Araujo, Gretchen von Helms, was involved in a serious accident on October 18, 2020 and was expected to be out of work for at least one year and is presently in the same status with no definite return date. She had acted as lead counsel in Mr. Araujo's representation. Mr. Valencia has stepped in as lead counsel and is requesting a continuance to a suggested January date to properly prepare sentencing documents on Mr. Araujo's behalf.

Mr. Ronis was informed that his client may be seeking new counsel and to that end was contacted by David Wilkstrom, indicating that he would likely be retained by Mr. Cazarez to represent him at sentencing. Mr. Wilkstrom indicated that he expected to have a final decision this week as to whether or not he would be entering the case and seeking a continuance of the presently scheduled date.

Both Mr. Ronis and Mr. Valencia further submit that the Covid disruption of the past 18 months has severely impacted their ability to travel and meet with their respective clients due to restrictions imposed by the Federal facility in which they have been housed and inconsistent travel limitations.

The Government has no objection to this request with the understanding that all parties will be prepared to proceed by mid-January.

It is respectfully requested that a new sentencing date be set any date convenient to the Court in the later part of January, or anytime thereafter, and that new motion filing dates be set during the month of January that are convenient to the Court. We thank the Court for your understanding of this matter.

I have informed all counsel and there is no objection to this request.

Respectfully submitted,  
<sup>/s/</sup>  
*Jan Edward Ronis,*  
*Gretchen C. von Helms,*  
*Guadalupe Valencia*

cc: Assistant United States Attorney, Amanda Houle (By ECF and email)